7 ALTERNATIVES TO THE PROJECT

The California Environmental Quality Act (CEQA) Guidelines (Section 15126.6[a]) require an evaluation of "a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic project objectives but would avoid or substantially lessen any of the significant effects, and evaluate the comparative merits of the alternatives." The purpose of the alternatives analysis is to determine whether or not a variation of the project would reduce, or eliminate, significant project impacts, within the basic framework of the objectives.

Thus, alternatives considered in an EIR should be feasible, and should attain most of the basic project objectives. As described in Section 3.2, "Project Objectives," the objective of the Central Health Services Center (CHSC) project is to create a clinical environment where health care professionals can provide access to improved medical care to inmate patients at San Quentin State Prison such that U.S. Constitutional standards are met. The project is needed to meet the following state requirements:

- Provide a facility that is centrally located to the incarcerated population at SQSP, within a reasonable walking distance recognizing that the population served has health needs, requires emergency treatment access, and the safety and security concerns created by escorting of inmates across long distances.

- Provide a facility that is sufficiently sized to accommodate the health service needs of the SQSP inmate population.

- Provide a facility that meets minimum standards for adequate health care, including considerations for access, cleanliness, efficient movement to various medical providers, and sufficient record keeping.

- Ensure that safety and security criteria are met and can be efficiently executed, including considerations for sight lines, ambulance access (for transporting inmates who require hospital care off-site), proximity to housing cells, and the ability to keep inmates within secure facilities from the point they leave their cells to the point of entry to the medical facility.

7.1 RANGE OF ALTERNATIVES CONSIDERED

The range of alternatives studied in the EIR is governed by the "rule of reason," requiring evaluation of only those alternatives "necessary to permit a reasoned choice" (State CEQA Guidelines Section 15126.6[f]). Further, an EIR "need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative" (State CEQA Guidelines Section 15126.6[f][3]). The analysis should focus on alternatives that are feasible (i.e., that may be accomplished in a successful manner within a reasonable period of time) and that take economic, environmental, social and technological factors into account. Alternatives that are remote or speculative will not be discussed. Furthermore, the alternatives analyzed for a project should focus on reducing or avoiding significant environmental impacts associated with the project as proposed.

The State CEQA Guidelines (Section15126.6[e]) require that, among other alternatives, a "no-project" alternative be evaluated in comparison to the project and that it "discuss the existing conditions, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with the available infrastructure and community services." Accordingly, a No Project Alternative is analyzed in this DEIR.

As described in Chapter 3, "Project Description," the inadequate space available for health care facilities at SQSP and their dispersed location within the institution has resulted in the California Department of Corrections and Rehabilitation's (CDCR's) inability to provide constitutionally adequate health care services at SQSP. The federal

receiver has determined that a modern facility is needed at SQSP to provide for a minimum standard of care that meets U.S. constitutional standards.

During the public comment period for the notice of preparation and at the public scoping meeting, some commenters requested that CDCR consider transporting inmates to existing area hospitals or to medical facilities at the California Medical Facility in Vacaville (a State prison approximately 50 miles east of SQSP) as an alternative to the project. This operating scenario would require special arrangements with existing medical, mental health, and dental facilities, increased hospital security, additional SQSP staff and vehicles for transport, and escort of inmates to hospitals in the project vicinity. Further, due to the difficulty of transporting a population that poses public security risks, this would create a highly inefficient system and would delay the provision to health care, likely substantially exacerbating the existing problems that have resulted in the Federal Receiver's involvement and the ultimate need for the project. CDCR has not had a shortage of available medical facilities to meet its needs in the region; rather, there have been insufficient facilities on site to accommodate the day-to-day medical needs of a large and concentrated population of inmates. The Receivership has determined that a modern facility is needed at SQSP to provide for a minimum standard of care that meets constitutional standards. Therefore, an alternative that would transfer inmates to existing hospitals or other medical facilities would not meet constitutional standards of providing medical care at SQSP.

Consequently, a No Project Alternative that would eliminate the construction of a new medical facility at SQSP and an Off-Site Alternative that would construct a new medical facility in a location other than SQSP would not be feasible alternatives to the project. However, to provide additional information for decision makers and the public, this EIR evaluates a No Project Alternative and Rehabilitation of the Neumiller Building Alternative and describes why the Off-Site Alternative has been rejected from further consideration.

Regarding the construction of the proposed warehouse facility, this facility would not result in any residual significant and unavoidable environmental impacts except to the degree that it would contribute to the project's significant and unavoidable construction-related air quality impacts. Further, the warehouse is needed to support the functions at SQSP. Therefore, an alternative location for this facility would not be reasonable and is therefore evaluation of such is not required under CEQA.

7.2 SUMMARY OF ENVIRONMENTAL IMPACTS

The purpose of this section is to summarize the site-specific environmental constraints, as identified and discussed in Chapter 4, "Environmental Setting, Thresholds of Significance, Environmental Impacts, and Mitigation Measures," of this DEIR. Site-specific environmental constraints, including construction-related air, noise, and transportation impacts, and historic resources could result in significant or potentially significant environmental impacts. These constraints and their effects on the range of alternatives considered in this DEIR are discussed below.

As discussed in Section 4.2, "Air Quality," the project would generate construction-related emissions that could exceed the Bay Area Air Quality Management District (BAAQMD) significance thresholds. Mitigation is available to reduce construction-related air impacts to a less-than-significant level. However, the project in combination with cumulative development would result in the continued exceedance of regional air quality thresholds, which would be a cumulatively significant and unavoidable impact and the project's contribution would be considerable.

As discussed in Section 4.5, "Cultural Resources," the project would result in the demolition of Building 22, which contains some of the oldest structures at SQSP. While the dungeon (the oldest structure at SQSP) would be retained, the remaining structures would be demolished. Building 22 is considered a significant historic resource eligible for listing on the California Register of Historic Resources (CRHR). While mitigation recommended for the project would appropriately preserve building elements as well as appropriately document and record the

conditions of Building 22, impacts would nonetheless remain significant and unavoidable because the majority of the structure would be demolished and removed from the site.

As discussed in Section 4.9, "Noise," the project could generate construction-related noise that is incompatible with nearby residential land uses. Mitigation is available to reduce construction-related noise impacts to a less-than-significant level.

As discussed in Section 4.12, "Transportation," the project would result in construction-related traffic and parking impacts. Mitigation for the project would reduce this impact to a less-than-significant level.

7.3 ALTERNATIVES CONSIDERED BUT NOT ANALYZED IN DETAIL

State CEQA Guidelines Section 15126.6(c) provides that an EIR "should also identify any alternatives that were considered by the lead agency but rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. This section provides a discussion of two alternatives (Seismic Retrofit of Building 22 and Other On-Site Location alternatives) and explains the reasons for rejecting these alternatives from further consideration.

7.3.1 SEISMIC RETROFIT AND REUSE OF BUILDING 22 ALTERNATIVE

Under this alternative, Building 22 would be seismically retrofitted, internally remodeled, and reoccupied as a hospital. The existing Building 22 is constructed primarily of unreinforced masonry and a structural evaluation determined that the building was a Seismic Risk Level VI, classifying it as having extensive structural damage making collapse likely in a strong seismic event. The classification additionally characterizes the building as having an imminent threat to occupants and/or adjacent property, which resulted in most of the building being vacated, excluding the library.

The State of California, Department of General Services (DGS) evaluated the seismic rehabilitation of Building 22 in 2001 and prepared the *Final Initial Study and Mitigated Negative Declaration for the Seismic Retrofit of Building 22 at San Quentin State Prison* (CDCR 2001). The initial study/mitigated negative declaration (IS/MND) evaluated the environmental impacts associated with proposed seismic improvements, including strengthening of existing masonry walls and wood diaphragms, construction of new concrete walls, and bracing existing structural features. These improvements would allow reoccupation of the building. In addition to the seismic improvements, other structural improvements would be needed under this alternative to provide the space necessary to establish appropriate facilities. These improvements would require the internal reconfiguration of floor space to provide open floors. The footprint of the existing Building 22 is 22,256 gross square feet and 52 feet wide by 428 feet long. Building 22 consists of five distinct structures and comprises an approximate area of 54,100 gross square feet. Each distinct structure is constructed with different floor elevations, resulting in a reduction in the available functional area of the building to only 37,200 net square feet. The medical, dental, and mental health programs require substantially greater space than is available within Building 22. It is approximated that 115,000 gross square feet of space would be required to meet constitutional standards for the provision of medical, dental, and mental health services at SQSP. Even with the internal reconfiguration of Building 22, because the building is comprised of multiple building structures with unconnected and differing floor levels of each, the functional floor space is limited to a usable area of 37,200 square feet, making the building unable to support the necessary CHSC program area and provide efficient and effective access to medical care.

In addition, in preparation of the IS/MND for the seismic retrofit for Building 22, DGS also prepared a budget package to fund the seismic improvements. The budget package was funded by the State Legislature but bids came in twice as high as available funding, so the retrofit program did not move forward. It should be noted that bids did not include the costs associated with the renovation of Building 22 to provide building compliance for fire life safety, accessibility nor the program related improvements that would be required to support the ultimate use of the building by San Quentin. Based on review of these bids and in consideration of the additional costs

required to renovate the building to provide code compliance and spatial improvements and upgrades, CDCR determined that it would not be cost effective to seismically retrofit and upgrade Building 22 to accommodate the needs of the project. Further, in consideration of the proposed CHSC, CDCR reevaluated whether the renovation of Building 22 would provide a viable alternative for consideration. However, because the amount of usable floor space that could be provided with renovation (i.e., 37,200 square feet) would be substantially below the needed program space (i.e., 115,000 square feet), it was determined that this alternative would not be feasible and this alternative was rejected from further consideration.

7.3.2 OTHER ALTERNATIVES FOR ON-SITE LOCATIONS

During the preliminary design process, CDCR evaluated several different on-site locations for the siting of the new CHSC. One of the alternatives for on-site locations has been discussed above in Section 7.3.1, "Seismic Retrofit of Building 22 Alternative." Additional on-site locations for the proposed CHSC included consideration of the following:

- main entry courtyard
- west block yard space
- general population yard space
- west yard/laundry area
- Warehouse Area 1
- Warehouse Area 2
- prison industry buildings
- H-Unit complex/approved condemned inmate complex

Exhibit 7-1 presents the locations of the above on-site locations, including the location of Building 22 and the Neumiller Building.

In siting a new medical facility on the existing grounds and within the existing operational structure of SQSP, multiple functional/operational, security/safety, and legal requirements must be considered and provided for in the ultimate site that is selected. Unlike other types of construction projects (e.g., retail space, residential), security and movement of inmates within a prison is a primary concern when designing and siting a new facility within an existing prison. For the new CHSC, CDCR must meet the following requirements.

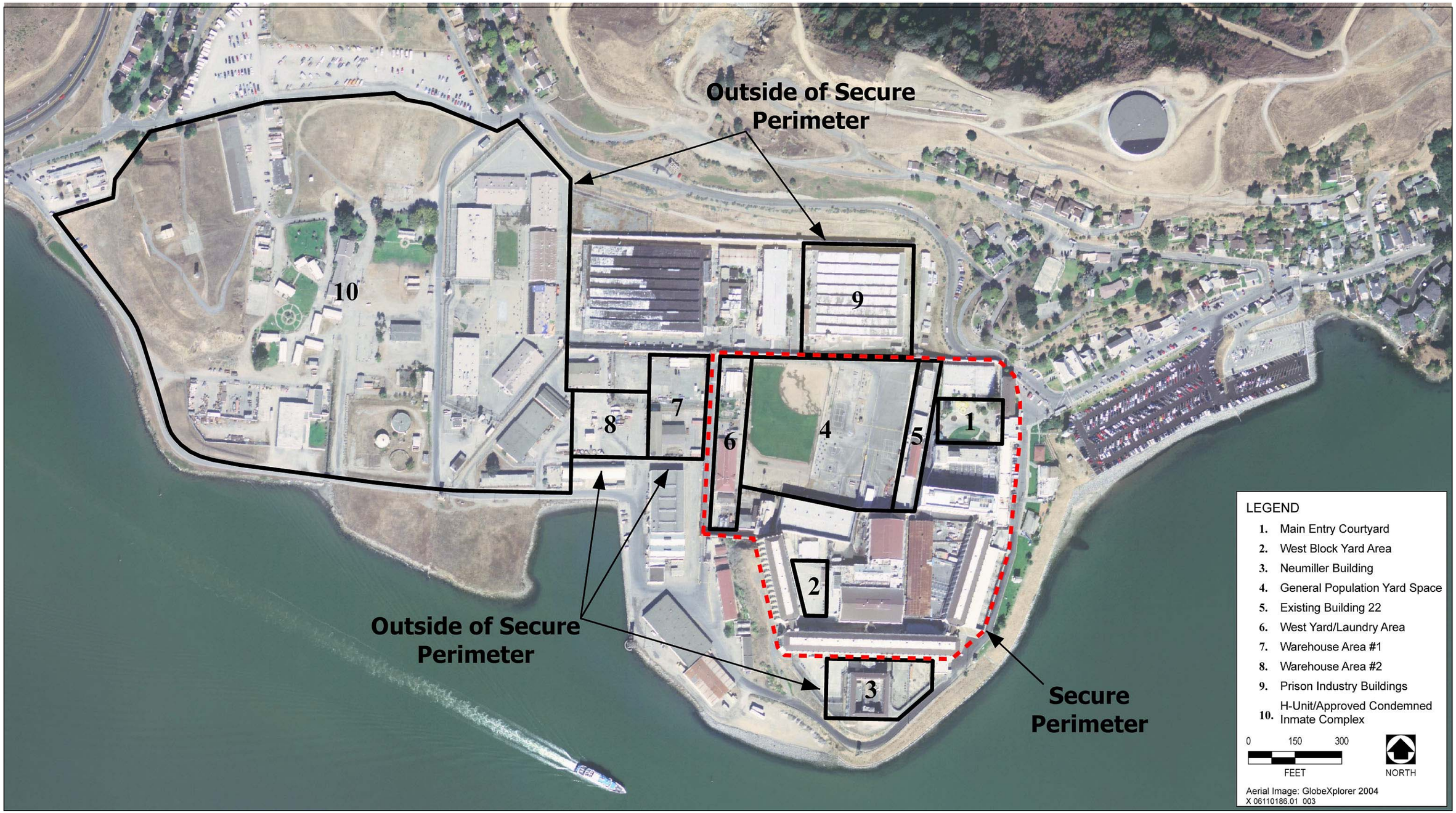
Functional/Operational Requirements:

- CHSC must be easily accessible to the SQSP inmate population. Because the building would be used by inmates requiring various levels of medical attention (ambulatory clinical treatment to sub-acute in-patient), it must be located within the secure perimeter of the facility and within a short walking/escort distance (400–500 feet) from the main housing unit areas to allow for the safe, efficient escort for appointments and quick transport of inmates during medical crisis.

- Sufficient space must be provided for all medical services. Space requirements are determined based on population numbers and inmate security levels that would be served by the CHSC. Estimated space requirements are a minimum of approximately 115,000 square feet.

- The new location shall not permanently disrupt or otherwise alter other programs or functions within SQSP.

- SQSP must continue to provide existing levels of program services including receiving and release, prison industries, exercise yard space, and craft and hobby space.



SQSP CHSC—On-Site Locations Considered in Siting the CHSC **Exhibit 7-1**

Security/Safety Requirements:

- The new building location must maintain and provide for clean (i.e., unobstructed) sight lines of all building sides and out-of-bounds areas from existing perimeter towers.

- The new building location must allow SQSP to efficiently use existing security zones to maintain separation of facilities and complexes to accommodate security needs.

- The new building location must meet all existing state building, seismic, accessibility, and fire and life safety design standards.

Environmental Requirements:

- The new location should minimize, to the greatest degree feasible, potential environmental impacts associated with construction and operation of the new facility.

In addition to the above, CDCR must also evaluate the degree to which alternatives considered would result in significant impacts on the environment.

CDCR comprehensively evaluated the eight on-site locations in addition to considering the rehabilitation of the existing Building 22. This evaluation is included in Appendix G. A summary of the evaluation for the eight on-site locations is presented below.

Entry Courtyard and West Block Yard Area. The eight on-site location alternatives were evaluated in consideration of the above requirements. While the entry courtyard area and west block yard area would be located within the secure perimeter of the prison and close to the main prison population, these sites were rejected from further consideration because neither of these sites were large enough for a new building to be constructed while maintaining compliance with building code setback requirements with adjacent on-site buildings. Additionally, adequate life safety vehicular access and site circulation to and around the buildings would be adversely compromised. Further, location of the project program within these areas would result in blocking of the security sight lines from the guard towers, provide for limited staging space for construction, as well as removing limited yard space for use by inmates further exacerbating already substandard yard space conditions at SQSP.

General Population Yard Area and West Yard/Laundry Area. The general population yard area and the west yard/laundry area would be located within the secure perimeter of SQSP; however, these sites were rejected from further consideration because they would either result in the removal of currently substandard yard space or would be located greater than 500 feet from the main prison population (approximately 800 feet for the west yard/laundry area) and could result in increased safety risks associated with the escorting of inmates to and from the CHSC, possibly precluding the access of inmates to medical care. Further, construction of a new building in the general population yard area would also result in removing the primary area where inmates and staff of SQSP would be located in the event of fire or other emergency in SQSP. The west yard/laundry area is located at the edge of the secure perimeter near the vehicle sallyport, and could result in potential conflicts with incoming/outgoing vehicle circulation. Finally, the west yard/laundry area supports Native American sacred ground and a sweat lodge. Construction of the CHSC in this location would result in the removal of sweat lodge and other older buildings that may be considered culturally and historically significant.

Warehouse Area 1, Warehouse Area 2, Prison Industry Buildings, and H-Unit/Approved Condemned Inmate Complex Sites. The Warehouse Area 1, Warehouse Area 2, prison industry buildings, and H-Unit/Approved Condemned Inmate Complex sites were all rejected from further consideration because they are located outside the secure perimeter of SQSP and they would be located far from the main prison population such that increased safety risks would be created in escorting of inmates to and from the CHSC. Access by inmates

would potentially be precluded or substantially delayed due to the need for additional security clearance and processing as inmates would need to travel out of the secured area the cell blocks. In addition, all of these sites would require the relocation of existing and approved programs and services, for which space is not available within the existing grounds of SQSP. Therefore, these on-site locations were rejected from further consideration.

Based on a detailed review of the eight on-site location alternatives in consideration of the functional/operational, security/safety, and environmental requirements for the siting of a new building, none of the alternative sites could feasibly support the project objectives and purpose of the proposed CHSC. As such, these sites were rejected from further consideration.

7.4 ALTERNATIVE CONSIDERED FOR DETAILED EVALUATION

The analysis presented below provides evaluation of two alternatives to the project: No Project (No Development) Alternative and the Neumiller Building Alternative. These alternatives were selected based on their ability to reduce or avoid the project's significant and significant and unavoidable impacts based on the constraints identified in Section 7.2, "Summary of Environmental Impacts."

7.4.1 NO PROJECT (NO DEVELOPMENT) ALTERNATIVE

Under this alternative no actions would be taken at the project site. No development of the project site would occur and medical, mental health, and dental services would continue to be provided in substandard and constitutionally inadequate facilities. Existing health care facilities at SQSP would likely undergo minor upgrades within the existing facility footprint to the degree that upgrades would be feasible. These upgrades could include improvements to shower facilities, medical supply cabinets and storage facilities, and upgrades to electrical and plumbing infrastructure where feasible.

Under this alternative, health care services would very likely continue to fail to meet constitutional standards. As a result, it would be expected that the federal Receiver would reissue its mandate requiring CDCR to improve health care facilities at SQSP. Therefore, under the No Project Alternative, healthcare services would likely continue to fail to meet constitutional standards for the foreseeable future.

Consistent with CEQA requirements, this No Project (No Development) Alternative is evaluated in this DEIR. The No Project (No Development) Alternative would not meet the project's basic objective to provide constitutionally adequate health care services at SQSP.

ENVIRONMENTAL ANALYSIS

Visual Resources

Under this alternative, the project site would not be developed and Building 22 would remain. Minor upgrades to the existing health care facilities would be required to partially meet mandatory federal requirements for the provision of constitutionally adequate health care services at SQSP; however, these upgrades would not be expected to substantially degrade the existing visual character of these facilities. By comparison, the project would result in the construction of a taller building within the Building 22 footprint and the construction of a new warehouse facility. The new building would result in one structure in the former location of five structures. This new structure would provide greater organization in the views of buildings on-site and more continuity of design with other prominent SQSP buildings. The new warehouse building would be single-story in a location where other similar warehouse structures are present and would not be visible from off-site areas. No significant visual impacts would occur under the project. Because the proposed project would not result in any significant visual impacts, this alternative would not avoid any significant impacts of the project. *[Similar]*

Air Quality

This alternative would not include any new development, and thus would not generate new construction or operations-related air emissions. By comparison, the proposed project would result in less-than-significant operational emissions and less-than-significant project impacts after mitigation related to construction emissions. The project's construction-related emissions in combination with cumulative development would contribute to the continued exceedance of regional air quality thresholds, which would be a cumulatively significant, and unavoidable air quality impacts, to which the project's contribution would be considerable. Because this alternative would not generate any increased construction or operational emissions, this alternative would avoid the project's considerable contribution to a significant and unavoidable cumulative air quality impact. *[Less]*

Hydrology, Water Quality, and Shoreline Biological Resources

Under the No Project (No Development) Alternative no new major construction would occur; therefore, no potential construction-related releases of sediment and contaminants into San Francisco Bay would occur. By comparison, the project would result in construction and operation activities that could result in degradation of the quality of stormwater that enters San Francisco Bay, which provides suitable habitat for fish and wildlife species. However, recommended mitigation would reduce the project's impact to a less-than-significant level. Although project impacts would be less-than-significant, this alternative would result in no discharge of sediment or contaminants to the Bay (rather than some); therefore, this alternative's impacts on hydrology, water quality, and shoreline biological resources are considered slightly less than those associated with the project. *[Less]*

Land Use

Under this alternative, development of a medical warehouse and new facility to house health services would not occur and Building 22 would remain in its dilapidated and unsafe state. By comparison, the proposed project would include the development of a new CHSC building and medical warehouse similar to other CDCR prison facilities. No significant land use impacts were identified for the project, so this alternative would not reduce or avoid any significant land use impacts associated with the project. *[Similar]*

Cultural Resources

Under this alternative, no development would occur and as a result Building 22 would remain in its existing state. The Risk Level VI status of Building 22 means the building has extensive structural damage with collapse likely in a major seismic event and is considered an imminent threat to occupants and/or adjacent property. A major seismic event that could result in severe damage to Building 22 is likely over the next 25 years. The project would result in the demolition of Building 22 and preservation and seismic upgrade of the dungeon. The State Historic Preservation Officer determined that Building 22 qualifies for listing on the CRHR, therefore, the project would result in a significant and unavoidable cultural resources impact. However, under this alternative, Building 22 would remain and no seismic upgrades would occur. While this alternative would leave the existing Building 22 in place, this building would likely suffer severe damage, including possible collapse, during a future seismic event. If this were to occur, the dungeon would not be preserved as it would be with the proposed project. Nonetheless, because this alternative would not result in the demolition of Building 22, this alternative would eliminate the project's significant and unavoidable impact and cumulative cultural resources impact. *[Less]*

Earth Resources

The No Project (No Development) Alternative would not include the construction of any new facilities and, as a result, Building 22 would remain in its existing state. Minor improvements to existing health facilities at SQSP would be required; however, these improvements would be built in compliance with the current version of the California Building Code. By comparison, the project would result in significant impacts related to seismically

induced liquefaction at the warehouse site, and lateral spread, ground failure, and compressible and corrosive soils at the warehouse and CHSC site. However, all impacts would be reduced to less-than-significant levels after mitigation. Because the project would not result in any significant earth resource impacts after mitigation, this alternative would not reduce any significant impacts of the project. *[Similar]*

Hazards and Hazardous Materials

Under the No Project (No Development) Alternative no new development would occur and Building 22 would remain in its existing state. While the hazardous materials inspection reports identified areas of Building 22 where concentrations of lead-based paint and asbestos-containing materials were found in the building materials, potential hazards associated with exposure to these materials would be minimal because the building has been vacated and access to the building is limited. By comparison, the project would result in the potential for construction workers to be exposed to hazardous materials present in Building 22 during construction activities (e.g., demolition, grading, excavation, hauling building materials). However, all project impacts would be reduced to less-than-significant levels after mitigation through implementation of appropriate precautions and demolition procedures. Because the project would not result in any significant hazards and hazardous materials impacts after mitigation, this alternative would not reduce any significant impacts of the project. *[Similar]*

Noise

This alternative would not involve new major construction and it is anticipated that construction associated with proposed upgrades to existing facilities would be minor. By comparison, the proposed project would result in both demolition and construction-related noise impacts. The project would not substantially affect operational traffic noise levels along area roadways, so this alternative would not be substantially different but would generate slightly less traffic noise than the project. *[Less]*

Employment, Population, and Housing

Under this alternative, the number of employees at SQSP would not increase. As a result, this alternative would not have any adverse effects on local and regional employment, population, or housing opportunities. By comparison, the proposed project would increase the number of employees at SQSP (i.e., up to 75 new employees). However, project-related population growth and associated demands for housing and employment opportunities would be absorbed in growth projections of regional and local communities and would not substantially increase demand for housing in any one area. Because the project would not result in any significant impacts on employment, population, and housing, this alternative would not reduce any significant impacts of the project. *[Similar]*

Public Services and Utilities

Because no new facilities would be constructed under the No Project (No Development) Alternative, no effects on electricity and natural gas supplies and facilities; solid waste facilities; police, fire protection, and emergency services; and wastewater facilities and treatment capacity would occur. However, impacts to these public services and utilities were determined to be less than significant with the project. Therefore, this alternative would not reduce or avoid any significant impacts of the project to these public services or utilities.

The project would result in a net increase in water demands of 2.5 AFY. While these demands would not result in a significant project-related impact to water supplies because it does not exceed MMWD's significance threshold of 100 AFY, they would contribute to the further exacerbation of MMWD's operational yield shortfall. Therefore, the project would result in a considerable contribution to a cumulatively significant water supply impact. Under the No Project Alternative, this considerable contribution to a significant cumulative impact would be avoided

because no increase in water demands would occur. Therefore, this alternative would have less water supply impacts. *[Less]*

Transportation

The No Project (No Development) Alternative would not develop any new facilities and would not result in any construction-related impacts. This alternative would not increase the number of employees at SQSP and, as a result, would not generate any new traffic. By comparison, the CHSC project would result in construction-related and operational traffic and parking impacts. During the peak construction period, if all construction workers arrived during the morning peak hour and departed during the evening peak hour, the project could potentially result in up to 149 peak hours construction trips. Although these trips would be temporary, because they could occur during peak traffic hours, project-related construction traffic could substantially affect the operation of local roadway intersections. With implementation of project, no existing parking spaces would be removed and no new parking would be created. Overall, the project would result in a maximum increased demand for 20 parking spaces, which is substantially less than available parking capacity at SQSP. However, recommended mitigation would reduce these impacts to a less-than-significant level. Finally, the project would not result in any significant operational traffic impacts because all intersections and roadways would continue to operate acceptably and project-related traffic would not exceed significance thresholds. Nonetheless, because this alternative would not result in the generation of any traffic, overall impacts would be less. *[Less]*

Conclusion

The No Project (No Development) Alternative would be environmentally superior to the proposed project with respect to the following issues: air quality; hydrology, water quality, and shoreline biological resources; cultural resources; noise; water supply; and transportation. It would be similar to the project with respect to visual resources; land use; earth resources; hazards and hazardous materials; employment, population, and housing; and public services. Overall, this alternative is environmentally superior to the proposed project; however, this alternative would not attain any of the objectives of the project.

7.4.2 REHABILITATION OF THE NEUMILLER BUILDING ALTERNATIVE

Under this alternative, Neumiller Building would be seismically upgraded, renovated and expanded to provide for adequate and centralized housing of medical services at SQSP. Medical, mental, and dental health services are currently provided within the prison perimeter in limited facilities within the Neumiller Building, which is located at the southern tip of the prison, and in several substandard, makeshift clinic spaces in housing blocks and the gym. In response to the 1990 Earthquake Safety and Public Rehabilitation Bond Act, a seismic evaluation of the Neumiller Building determined that this building is classified as Seismic Risk Level V and would require substantial retrofit to meet current seismic safety standards. Extensive rehabilitation of the dilapidated Neumiller Building and additions to provide for sufficient building area would additionally be necessary. Further, the existing Neumiller Building is the subject of existing legal challenges regarding inadequate health care at SQSP.

To provide adequate medical services at SQSP, the Neumiller Building would need to house all health services at the prison and would need to be seismically retrofitted, renovated and the buiding would need to be expanded to provide adequate space for required medical services. Alternatively, the building would need to be demolished altogether, and rebuilt to meet the standards necessary to meet adequate medical care standards. Neumiller currently provides 68,800 square feet of space, in a configuration that is operationally inefficient. The programming for the project has determined a need for approximately 115,000 square feet of space, configured in an efficient flow. Therefore, Neumiller would require a substantial expansion, adding almost as much space as currently provided. This would be difficult to accomplish without demolishing Neumiller.

To accommodate these improvements, all existing services (e.g., medical, dental, mental health) would need to vacate the existing Neumiller Building and relocate to temporary space within SQSP. Currently, no space is available within the secure perimeter of SQSP. Besides there not being any space available to develop temporary facilities within San Quentin, attempting to develop such temporary replacement space, if any space were available would require extensive construction to comply with regulatory and code requirements for the operation of the spaces. Besides the outpatient clinic and clinical administrative support areas, Neumiller additionally houses many specialized medical functions that are not easily accommodated by standard building spaces and are specifically regulated by code and/or medical licensing requirements. These functions currently operate in undersized, non-conforming, non-licensable spaces due to the age and degradation of the existing facility which is the resulting purpose and need of this project.

Once relocated, even temporarily, these functions would be required to be accomplished in accordance with code and licensing requirements for which existing space, buildings, and infrastructure will be unable to accommodate. These specific functions include the trauma treatment area – emergency room (TTA), in-patient medical care, pharmacy, laboratory, and medical records. Development of temporary space that can accommodate these specialized requirements related to minimum space, structural code, emergency power, medical gases, ventilation, and security creates a substantial project unto itself with additional environmental impacts and could be considered cost prohibitive to develop such space types twice (i.e., temporary and permanent spaces).

At SQSP, space is limited because of the extensive facilities that are currently in place and the need to maintain programs and security requirements. CDCR is charged with providing a number of programs and services within each of its prison facilities. At SQSP, CDCR is required to provide adequate health care, access to legal services, recreation and yard space, housing, prison industry, and educational programs that meet CDCR's program standards. Each of these programs has minimum requirements for the type, location, and amount of space required to implement these programs. Details regarding these program requirements can be founds in the Design Criteria Guidelines, Standard Design Documents, Space Standards and site specific Architectural Program Reports. In some instances, space requirements are not currently being met for certain programs (e.g., education, yard space). Therefore, if the Neumiller Building were to be reconstructed, the temporary space required for the existing medical services that are offered in the Neumiller Building would need to be of adequate size, in close proximity to the existing inmate population (see project objectives), and would need to be temporarily located in an area that would not interfere with or reduce the existing space of any of SQSP's existing programs and services.

Building 22 is the only vacant building located in close proximity to the main prison population. However, this building could not temporarily support the medical services offered in the Neumiller Building because it has a higher (or worse) seismic rating than the Neumiller Building and has been determined to be unsafe for occupancy, in addition to its myriad of other problems, as discussed previously. No other vacant buildings are located at SQSP. Other on-site locations for new or temporary building construction were evaluated during the initial design and planning stages; however, based on a comprehensive review of these areas, none would meet the space, security, or functional requirements for either the short or long term. Therefore, it would be infeasible to relocate the existing medical services within the Neumiller Building to a temporary location at SQSP while still meeting constitutional standards for the provision of medical care and existing requirements and mandates for all other prison programs and services offered at SQSP.

ENVIRONMENTAL ANALYSIS

Visual Resources

Under this alternative, the new, expanded, and seismically retrofitted (or reconstructed)Neumiller Building would be substantially larger than the existing Neumiller Building. Further, the Neumiller Building is located near the shoreline of San Francisco Bay and is highly visible from off-site areas, including Corte Madera, the ferry boat, and the city of Larkspur. Because of its likely substantially increased size and visual prominence from off-site

areas, this alternative could result in the substantial alteration of the local viewshed potentially interfering with views of the existing SQSP facilities and views of the San Quentin Ridgeline. This would be a new potentially significant impact that would not occur under the project. By comparison, the project would result in the construction of a 5-story building within the interior portion of SQSP where views from off-site areas are limited. The new CHSC would construct one structure that would not visually block any existing on-site facilities or views of the San Quentin Ridgeline. Further, this facility would be designed to compliment architectural features of existing on-site buildings to result in views of the site that appear to be more organized and cohesive compared to existing conditions. Overall, visual impacts would be less than significant under the project. Because this alternative could result in potential significant visual impacts, this alternative's visual impacts would be greater than the project. *[Greater]*

Air Quality

Both this alternative and the project would result in development of the project site and the generation of associated construction-and operation-related air emissions. Further, the same number of staff would be employed under this alternative and would result in a similar level of traffic-generated air emissions. Overall air emissions would be the similar to the project under this alternative. *[Similar]*

Hydrology, Water Quality, and Shoreline Biological Resources

Under this alternative, a similar area would be developed and drainage facilities would be constructed to convey stormwater to San Francisco Bay. With building construction, the potential exists to result in the release of sediment and contaminants into San Francisco Bay. It is anticipated that this alternative would implement similar mitigation recommend for the project that would reduce the potential water quality impacts and impacts to shoreline resources to a less-than-significant level. Because the impacts of this alternative could also be reduced to less than significant with mitigation, impacts on hydrology, water quality, and shoreline biological resources would be similar to the project. *[Similar]*

Land Use

Under this alternative, Neumiler Building would be rehabilitated and expanded to house health services and Building 22 would remain in its dilapidated and unsafe state. No significant land use impacts were identified for the project, so this alternative would not reduce or avoid any significant land use impacts associated with the project. However, it is possible that some features of the rehabilitated/reconstructed building could encroach the 100-foot shoreline zone within the jurisdiction of the Bay Conservation and Development Commission (BCDC); if this were the case, the project could also affect land use policies pertaining to access to the shoreline. *[Similar/greater]*

Cultural Resources

Similar to the project, Neumiller Building would also qualify as a historic structure because of its age. Its substantial reconstruction would likely result in a significant and unavoidable historic resources impact. Because this facility does not support the oldest structures at SQSP (those are present in Building 22), it likely that demolition or substantial reconstruction of the Neumiller Building would reduce the project's significant and unavoidable historic resources impacts because it would preserve Building 22 and would avoid the demolition of the oldest structures at SQSP. Nonetheless, the Neumiller Building also likely qualifies as a historic structure eligible for listing on the CRHR and its demolition or reconstruction would be a significant and unavoidable historic resources impact. Therefore, this alternative would not eliminate the project's significant and unavoidable historic resource impact, but it would likely reduce the impact compared to the project. *[Less]*

Earth Resources

The Neumiller Building is located in close proximity to the CHSC building and is likely situated on similar soils such that similar potential for lateral spread, seismically-induced ground failure, and compressible and corrosive soil impacts would occur. Similar mitigation recommended for the project would likely be implemented under this alternative to reduce potential impacts to a less-than-significant level. With implementation of recommended mitigation, the project would result in less-than-significant earth resources impacts. Because this alternative would not reduce any significant impacts of the project, overall earth resources impacts would be similar to the project. *[Similar]*

Hazards and Hazardous Materials

Under this alternative, Neumiller Building would be rehabilitated and expanded. Similar to Building 22, it is likely that areas of Neumiller Building contain concentrations of lead-based paint and asbestos-containing materials in the building materials. This alternative and the project would result in the potential for construction workers to be exposed to hazardous materials present in Neumiller Building during construction activities (e.g., demolition, grading, excavation, hauling building materials). However, all project impacts would be reduced to less-than-significant levels after mitigation through implementation of appropriate precautions and demolition procedures. Potential hazards and hazardous materials impacts would be reduced to a less-than-significant level. No significant hazard and hazardous materials impacts were identified for the project, so this alternative would not reduce or avoid any significant hazards and hazardous materials impacts associated with the project. *[Similar]*

Noise

Similar to the project, this alternative would require a substantial construction effort that would result in the generation of construction-related noise; however, this alternative would implement similar mitigation recommended for the project that would restrict certain construction activities during noise-sensitive time periods. Therefore, construction-related noise impacts would be reduced to a less-than-significant level. Operational traffic noise would be the same as the project, because this alternative would result in the same number of employees commuting to the site on a daily basis. Overall noise impacts would be similar to the project. *[Similar]*

Employment, Population, and Housing

Similar to the project, the number of employees under this alternative would increase by up to 75 to meet requirements of the receivership. Population growth and associated demands for housing and employment opportunities under this alternative would be absorbed in growth projections of regional and local communities and would not substantially increase demand for housing in any one area. No significant population and housing impacts were identified for the project, so this alternative would not reduce or avoid any significant population and housing impacts associated with the project. *[Similar]*

Public Services and Utilities

This alternative would result in similar demands for public services and utilities as the project because the same services and facilities would be constructed. Overall, impacts would be similar to the project. *[Similar]*

Transportation

Similar to the project, this alternative would also increase the number of employees at SQSP by up to 75 and, as a result, would generate the same amount of new traffic trips. A similar number of construction personnel would be required to construct the new facility and would commute to the site on a daily basis. While potentially significant construction-related parking and traffic generation impacts would occur under this alternative, it is anticipated that

similar mitigation recommended for the project would be implemented to reduce these impacts to a less-than-significant level. Overall, traffic impacts under this alternative would be the same as the project. *[Similar]*

Conclusion

The Rehabilitation of The Neumiller Building Alternative would not be environmentally superior to the proposed project because it would not eliminate the project's significant and unavoidable air quality, water resources, and cultural resources impacts and it would result in one new potentially significant impact to views of the site from off-site areas. Overall, this alternative would be similar to the project with respect to land use, earth resources, and employment, population and housing, air quality, hydrology, water quality, and shoreline biological resources, hydrology and water quality, noise, water supply, and transportation. This alternative could potentially reduce, but not avoid, the project's significant and unavoidable historic resources impact. This alternative would meet all objectives of the project; however, this alternative would not be feasible to implement because no on-site space is available to temporarily house the medical services currently provided in the Neumiller Building while maintaining existing service levels for existing programs and services at SQSP.

7.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The No Project (No Development) Alternative would be environmentally superior to the proposed project. It would avoid the project's significant and unavoidable historic structures, although these resources are likely to be severely damaged if an expected strong seismic event is experienced at the site. It would also avoid cumulative construction-related air quality, and cumulative water supply impact. This alternative would not attain any of the objectives of the project.

The Rehabilitation of the Neumiller Building Alternative would not be environmentally superior to the proposed project because it would not eliminate the project's significant and unavoidable air quality, water resources, and cultural resources impacts and it would result in one new potentially significant impact to views of the site from off-site areas. This alternative could meet all objectives of the project; however, this alternative would not be feasible to implement because no on-site space is available to temporarily house the medical services currently provided in the Neumiller Building while maintaining existing service levels for existing programs and services at SQSP.

The proposed project is the environmentally superior feasible alternative.